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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Gary Bernstein

Case No.: 2:21-cv-246

Plaintiff,

Defendants' Removal Petition

vs.

Blake Reidhead, Inc. d/b/a BDR Transport; Steven Thomas West; Does I through XX, inclusive; and Roe Business Entities I through XX, inclusive,

Defendants.

Blake Reidhead, Inc. & Steven West petition to remove this case to the United States District Court for the District of Nevada from the Eighth Judicial District Court for the State of Nevada. This petition for removal is signed per Rule 11.

Removal is appropriate per 28 U.S.C. § 1441 because diversity jurisdiction is present per 28 U.S.C. 1332. Plaintiff alleges he is Nevada citizen and that Steven West is a citizen of Arizona.¹ Blake Reidhead, Inc. is incorporated in Arizona and has its principal place of business in Arizona.

The amount in controversy is also satisfied. On February 10, 2021, Plaintiff filed a motion in state court that asserted past medical damages of \$716,237.08 to date.² Defendants removed this case within 30 days of learning that the amount in controversy exceeds \$75,000.

¹ ECF No. 1-2 at ¶¶ 1, 3.

² ECF No. 1-5.

DATED this 14th day of February, 2021.



BY: /s/ Michael Lowry
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Certificate of Service

Pursuant to NRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on February 14, 2021, I served **Defendants' Removal Petition** as follows:

- by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

Ladah Law Firm 517 S. 3 rd St. Las Vegas, NV 89101 Attorneys for Gary Bernstein	
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BY: /s/ Michael Lowry

An Employee of

